

The Honorable Robert S. Lasnik

IN THE UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT OF WASHINGTON

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, a
Washington non-profit corporation,
Plaintiff,

v.

MAURICE KING, LEWIS KING,
GLEN YOSHIOKA, DYLAN WALL,
SARA WHITE, and AMERICAN
MARRIAGE MINISTRIES, a Washington
non-profit corporation,

Defendants

AMERICAN MARRIAGE MINISTRIES, a
Washington non-profit corporation,
Counter-Claimant/
Third-Party Plaintiff,

v.

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, a
Washington non-profit corporation; and
UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, INC., a
Washington non-profit corporation,
Counter-Defendants/
Third-Party Defendants.

Case No. 2:19-CV-00301-RSL

**[PROPOSED] ORDER REGARDING
DEFENDANT AND COUNTER-
CLAIMANT AMERICAN MARRIAGE
MINISTRIES' MOTION TO COMPEL**

**[PROPOSED] ORDER REGARDING DEFENDANT AND COUNTER-
CLAIMANT AMERICAN MARRIAGE MINISTRIES' MOTION TO
COMPEL - 1**
Case No. 2:19-CV-00301-RSL

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1 This matter came on for hearing for this Court on Defendant/Counter-Claimant American
2 Marriage Ministries' Motion to Compel, and the Court is fully advised in the premises and has
3 reviewed the case file and pleadings contained therein as well as having considered the following:

4 1. Defendant and Counter-Claimant American Marriage Ministries' Motion to
5 Compel;

6 2. Declaration of Sheeba Roberts in Support of Defendant and Counter-Claimant
7 American Marriage Ministries' Motion to Compel;

8 3. Plaintiff's Response to Defendant and Counter-Claimant American Marriage
9 Ministries' Motion to Compel (if any);

10 4. Defendant and Counter-Claimant American Marriage Ministries' Reply to
11 Plaintiff's Response to Defendant and Counter-Claimant American Marriage Ministries' Motion
12 to Compel (if any);

13 5. Oral argument (if any).

14 Having considered these documents, and pursuant to Federal Rule of Civil Procedure 26,
15 Federal Rule of Civil Procedure 37, and Local Civil Rule 37, the Court finds and concludes as
16 follows:

17 1. American Marriage Ministries' Requests for Production 4, 5, 34, and 42 each call
18 for the production of discoverable materials.

19 2. Plaintiff has refused to produce documents responsive to these Requests.

20 3. The parties have met and conferred about Plaintiff's objections to these Requests
21 as required by the Court Rules.

22 4. Plaintiff's objections to these Requests are without merit.

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24 ///

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**[PROPOSED] ORDER REGARDING DEFENDANT AND COUNTER-
CLAIMANT AMERICAN MARRIAGE MINISTRIES' MOTION TO
COMPEL - 2
Case No. 2:19-CV-00301-RSL**

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IT IS HEREBY ORDERED:

1. Defendant and Counter-Claimant American Marriage Ministries' Motion to Compel is GRANTED.

2. Plaintiff shall respond to the outstanding discovery no later than fourteen (14) days from the date of this Order. Failure to comply with this Order may result in sanctions being imposed, including dismissal of Plaintiff's claims.

3. Defendant's request for attorneys' fees and costs is GRANTED. Defendant may file a properly supported request for fees and costs no later than fourteen (14) days from the date of this Order, and no longer than four pages. Any request shall be noted for the second Friday after it is filed. No later than the Monday before the noting date, Plaintiff may file a Response, no longer than four pages, addressing only the reasonableness of the fees and costs requested.

Dated: _____

The Honorable Robert S. Lasnik

Submitted by:

By: /s/ Sheeba Roberts

Sheeba Roberts, *Pro Hac Vice*

Betts Patterson Mines

111 SW 5th Ave., Suite 3650

Portland, OR 97204

Email: sroberts@bpmlaw.com

Of Attorneys for Maurice King, Lewis King, Glen Yoshioka,
Dylan Wall, Sarah White, and American Marriage Ministries

**[PROPOSED] ORDER REGARDING DEFENDANT AND COUNTER-
CLAIMANT AMERICAN MARRIAGE MINISTRIES' MOTION TO
COMPEL - 3
Case No. 2:19-CV-00301-RSL**

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CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2020, the foregoing **[PROPOSED] ORDER REGARDING DEFENDANT AND COUNTER-CLAIMANT AMERICAN MARRIAGE MINISTRIES' MOTION TO COMPEL** was electronically filed with **U.S. District Court for the Western District of Washington** through the CM/ECF eFiling system.

I further certify that on March 12, 2020, I served a copy of the foregoing on:

| | |
|---|--|
| Michael P. Matesky, II Matesky Law LLC 1001 4 th Ave., Suite 3200 Seattle, WA 98154 Fax: 206-701-0332 Email: litigation@mateskylaw.com <i>Of Attorneys for Plaintiff</i> | Michael B. Galletch Puget Sound Business & Litigation PLLC 411 University Street, Suite 1200 Seattle, WA 98101 Fax: --- Email: mike@psbizlit.com <i>Of Attorneys for Plaintiff</i> |
| Kelly Ann Mennemeier Nancy V. Stephens Benjamin J. Hodges Foster Garvey P.C. 1111 Third Ave., Suite 3000 Seattle, WA 98101-3299 Fax: 206-447-9700 Email: Kelly.mennemeier@foster.com Nancy.stephens@foster.com Ben.hodges@foster.com <i>Of Attorneys for American Marriage Ministries</i> | |

_____ by mailing to each of the foregoing a copy thereof, placed in a sealed envelope addressed as listed above and deposited in the United States mail at Portland, Oregon, and that postage thereon was fully prepaid.

_____ by facsimile transmission to the number shown above.

 X by additional e-service through the E-Filing system, if party was registered.

 X by courtesy email to the email addresses shown above.

/s/ Carrie J. Cook

Carrie J. Cook, CP

Legal Assistant/Certified Paralegal

[PROPOSED] ORDER REGARDING DEFENDANT AND COUNTER-CLAIMANT AMERICAN MARRIAGE MINISTRIES' MOTION TO COMPEL - 4
Case No. 2:19-CV-00301-RSL

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